

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
Docket No. R2001-1

Postal Rate and Fee Changes, 2001

DAVID B. POPKIN MOTION TO COMPEL RESPONSE TO INTERROGATORY
DBP/USPS-84

December 21, 2001

I move to compel response to the interrogatory submitted to the United States Postal Service that was objected to by them on December 17, 2001.

Respectfully submitted,

December 21, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-84 This interrogatory attempted to clarify the data that was presented in the Postal Service's response to OCA/USPS-235. If the data was relevant to respond to that interrogatory, it is relevant to clarify the data that was presented. I did not see the need to refer to subclass of mail, rates or fees, or service standards other than to state that it was in response to Interrogatory OCA/USPS-235. In following-up on an interrogatory to clarify the data, it should not be necessary to continually repeat the premise of the original interrogatory. Footnote 1 of the USPS Objection seems to object that I am attempting to confirm their hinting at the answer. I have learned that what I believe to be obvious, may not be obvious to the Postal Service. The Postal Service's reference to the hearings now underway as being a reason to object to this interrogatory is irrelevant. The expedited timing of this Docket was at the request of the Postal Service. The follow-up interrogatory was filed within the required time.

For the reasons stated, I move to compel responses to the referenced interrogatory.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

December 21, 2001

David B. Popkin